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December 9, 2024

VIA ECF

Honorable John G. Koeltl
United States District Judge
500 Pearl Street
New York, New York 10007

Re: *Leadenhall Capital Partners, et al. v. Wander, et al.*,
Case No. 1:24-cv-3453 (JGK)

Dear Judge Koeltl:

We write, on behalf of the 777 Entity Defendants and under Your Honor's Individual Practices I.A, I.E, and I.F, to request a uniform, one-week extension of time for all Defendants to file their reply briefs in support of their pending motions to dismiss: from the current deadline of December 12, 2024, to December 19, 2024. Counsel for the other Defendants join this request and counsel for Plaintiffs have consented to the relief requested.

There is good cause for this request. *First*, the four reply briefs should be submitted the same day; no one Defendant should file days after the other Defendants. *Second*, Plaintiffs sought and obtained leave to file an omnibus, 33,955-word opposition brief after the parties agreed to the current briefing schedule (ECF No. 241) and much of that opposition pertains to the 777 Entity Defendants' motion and requires a reply from each Defendant (or group of Defendants). *Third*, conflicting client obligations of counsel for multiple Defendants, including those of Mr. Harwood (*see* ECF No. 255), has made replying to Plaintiffs' omnibus opposition by the current deadline impractical.

This is the 777 Entity Defendants' first request for an extension of time in connection with this briefing deadline. We understand that, other than Mr. Pasko, no other Defendants have sought an extension of time for this briefing schedule. If the Court were to grant the requested extension, no other modifications to any existing deadlines would be necessary.

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We appreciate the Court's attention to this matter.

Respectfully submitted,

/s/John G. McCarthy
John G. McCarthy

cc: All Counsel of Record (via ECF only)